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Attorneys for Defendant  
THE HERSHEY COMPANY

*(Additional Counsel Listed on Signature Block)*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

REBECCA ESCOBAR, individually, and on  
behalf of those similarly situated,

Plaintiff,  
v.

THE HERSHEY COMPANY,  
Defendant.

Case No. 5:24-CV-06844-EJD

**STIPULATION AND ~~(PROPOSED)~~ ORDER  
TO EXTEND DEADLINE TO RESPOND TO  
AMENDED COMPLAINT AND MAINTAIN  
CURRENT HEARING DATE**

Plaintiff Rebecca Escobar and Defendant The Hershey Company (“Hershey”) jointly request, subject to Court approval, that Hershey’s deadline to respond to Plaintiff’s Amended Complaint be continued one week from January 30, 2025 to February 6, 2025. In support of this joint request, the Parties stipulate to the following facts and recitals:

1. On November 6, 2024, the Parties stipulated to extending Defendant’s deadline to respond to Plaintiff’s complaint to December 9, 2024. (Dkt. 11).

2. On December 4, 2024, the Parties stipulated to allowing Plaintiff to amend her complaint by December 9, 2024, with Defendant’s response to the amended complaint due by January 9, 2025. (Dkt. 18).

3. On December 31, 2024, the Parties further stipulated to allowing Plaintiff to amend her complaint by January 9, 2025, with Defendant’s response to the amended complaint due by January 30, 2025. (Dkt. 19).

4. On January 16, 2025, Hershey reserved March 27, 2025 for the hearing on its anticipated motion to dismiss.

1           5.       On January 17, 2025, the Court granted the Parties' stipulated to continuing the Initial  
2 Case Management Conference previously set for February 6, 2025 to March 27, 2025, the same date  
3 as the reserved hearing on Hershey's Motion to Dismiss. (Dkt. 24.)

4           6.       On January 28, 2025, Hershey met and conferred with counsel for Plaintiff to request  
5 a one-week extension of Hershey's response deadline due to unavoidable internal conflicts for  
6 Hershey and counsel for Hershey. Plaintiff agreed to the requested one-week extension.

7           7.       The Parties respectfully request, subject to Court approval, that the current March 27,  
8 2025 hearing date for Hershey's upcoming Motion to Dismiss, which was reserved on January 16,  
9 2025, remain on calendar even though the Motion will be filed outside the 14-day window specified  
10 in the Court's Standing Order. This would allow the Motion hearing to remain on the same day as  
11 the upcoming Case Management Conference. (Dkt. 24.) Aside from the Court's 14-day reservation  
12 window for hearings, the new deadline will not alter the date of any other event or deadline set by  
13 the Court.

14           IT IS HEREBY STIPULATED, through counsel of record, subject to this Court's approval,  
15 that the following deadlines shall apply in this action:

16           1.       Hershey's deadline to respond to Plaintiff's Amended Complaint is continued to  
17 February 6, 2025;

18           2.       The March 27, 2025 hearing on Hershey's upcoming Motion to Dismiss will remain  
19 on calendar.

20           IT IS SO STIPULATED.

21 Dated: January 28, 2025

Respectfully submitted,  
SHOOK, HARDY & BACON L.L.P.

22 By: /s/ Naoki S. Kaneko  
23       NAOKI S. KANEKO

24       Attorneys for Defendant  
25       THE HERSHEY COMPANY

1 Dated: January 28, 2025

POPE MCGLAMRY, P.C.

2 By: /s/ Michael L. McGlamry  
3 MICHAEL L. MCGLAMRY  
CAROLINE G. MCGLAMRY

4 Attorneys for Plaintiff  
5 REBECCA ESCOBAR  
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**ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

Pursuant to L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatories.

By: /s/ Naoki S. Kaneko  
NAOKI S. KANEKO

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on January 28, 2025, I caused a true and correct copy of the foregoing Stipulation to be filed electronically. Notice of this filing will be sent to all parties registered on this Court's ECF system by operation of the Court's electronic filing system. The Parties may access this filing through the Court's system.

By: /s/ Naoki S. Kaneko  
NAOKI S. KANEKO

~~[PROPOSED]~~ ORDER

Upon consideration of the Parties' Stipulation to Extend Deadline to Respond to Amended Complaint and Maintain Current Hearing Date is GRANTED:

1. The Hershey Company's deadline to respond to Plaintiff's Amended Complaint is continued to February 6, 2025;

2. The March 27, 2025 hearing on Hershey's upcoming Motion to Dismiss will remain on calendar.

IT IS SO ORDERED.

Dated: January 28, 2025.

By: \_\_\_\_\_

  
EDWARD J. DAVILA  
U.S. DISTRICT COURT JUDGE